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Shanahan, Caroline Japp, Jo Weber,
and Robin Smith

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SALLY STEINHART,

No. CV-10-00841 RS

Plaintiff,

v.

COUNTY OF SONOMA, SHERIFF-CORONER
BILL COGBILL and DEPUTY SHERIFFS M.
SHANAHAN and CAROLYN JAAP; HUMAN
SERVICES DEPARTMENT DIRECTOR JO
WEBER; FAMILY, YOUTH & CHILDREN'S
SERVICES DIVISION DIRECTOR CAROL
BAUER; YOUTH & CHILDREN'S SERVICES
DIVISION DIRECTOR NICHOLAS HONEY;
CHILD WELFARE SERVICES/ PROTECTIVE
SERVICES SOCIAL WORKERS JERRY ALLEN,
BETTY JOHNSON, and ROBIN SMITH,
individually and in their official capacities,
CALIFORNIA DEPARTMENT OF SOCIAL
SERVICES; DOES 1-50, and ROES 1-50, and
MOES 1-50, inclusive, jointly and severally,

Defendants.

**JOINT STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE SET FOR OCTOBER
21, 2010; ~~PROPOSED~~ ORDER**

This joint stipulation and request for entry of order to continue the initial Case Management Conference in this action is entered into by and between Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, Sheriff-Coroner William Cogbill, and County

employees Michael Shanahan, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, "County Defendants"). By this stipulation, these parties request that the initial Case Management Conference currently scheduled for October 21, 2010, be continued to December 16, 2010, or such other date as is convenient for the Court. Defendant the State Department of Social Services and other named defendants have not appeared in this action, and are not parties to this stipulation.

RECITALS

A. Plaintiff filed her initial Complaint for Declaratory and Injunctive Relief and Damages herein on February 26, 2010. Plaintiff believes that she effectuated service of the Complaint on County Defendants on or about May 12, 2010. Plaintiff filed her First Amended Complaint herein on June 21, 2010 (Dkt. No. 8).

B. On July 26, 2010, County Defendants filed their Motion to Dismiss the First Amended Complaint and Motion for More Definite Statement (Dkt. No. 12), and thereafter filed related motions seeking judicial notice and to seal certain documents (hereinafter, the "Motions"). Plaintiff has opposed all of these motions except the motion to seal. Pursuant to a Clerk's Notice filed September 27, 2010 (Dkt. No. 22), the Court vacated the hearing on the Motions, requiring that they be submitted without oral argument. The Court has not yet rendered a decision on the Motions.

D. County Defendants and Plaintiff have informally agreed to delay issuing Initial Disclosures and discovery requests until the Court has ruled on the pending Motions. The only other pending matter at this time is the initial Case Management Conference currently set to occur on October 21, 2010.

E. The parties to this stipulation request that the Court continue the initial Case Management Conference to a date after which the Court has issued a ruling on the pending Motions. A decision on the Motions will assist the parties in ascertaining the parameters of this case as well as the proper scope of discovery, which will impact scheduling requests.

F. The parties believe that an approximately 60-day continuance would likely be sufficient, and request the Court to continue the initial Case Management Conference in this matter to December 16, 2010, at 10:00 a.m.

G. For the information of Plaintiff and the Court, counsel for County Defendants will be present in Court at the time the initial Case Management Conference in this action is currently scheduled, on October 21, 2010, for a conference in another matter.

WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order as follows:

STIPULATION

1. The initial Case Management Conference currently scheduled to occur on October 21, 2010, is requested to be continued to December 16, 2010, at 10:00 a.m., or such other date and time as is convenient for the Court. The parties shall file a supplemental joint case management conference statement one week prior.

2. This stipulation does not prevent or preclude the parties from seeking additional relief from this Court, to amend this stipulation and order or otherwise.

Respectfully submitted,

Dated: Stephen M. Woodside, County Counsel

By: /s/ Anne L. Keck
Anne L. Keck, Deputy County Counsel
Attorneys for County Defendants

Dated: Sally Steinhart, Plaintiff in pro per

By: /s/ Sally Steinhart
Sally Steinhart

~~[PROPOSED]~~ ORDER

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, the initial Case Management Conference currently scheduled to occur on October 21, 2010, shall be continued to ~~December 16, 2010~~ January 20, 2011, at 10:00 a.m. The parties shall file a joint supplemental case management conference statement one week prior.

IT IS SO ORDERED.

Date: 10/15/10



HONORABLE RICHARD SEEBORG
United States District Judge